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26 Attorney for Plaintiffs
27 WILLIAM J. BERRY, JR.; CYNTHIA FALLS; and
28 SHANE KAUFMAN

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

WILLIAM J. BERRY, JR.;
CYNTHIA FALLS; and SHANE
KAUFMAN,

Plaintiffs,

v.

DESERT PALACE, INC., d/b/a
CAESARS PALACE; DOES I
through X, and ROE BUSINESS
ENTITIES I through X, inclusive,

Defendants.

Case No. 2:17-cv-00019-GMN-PAL

**STIPULATION AND ORDER RE:
FEDERAL RULE OF EVIDENCE
502(d)**

1 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs
2 WILLIAM J. BERRY, JR., CYNTHIA FALLS, and SHANE KAUFMANN and
3 Defendant DESERT PALACE, INC., d/b/a CAESARS PALACE, by and through
4 their respective counsel of record, as follows:

5 1. The production of privileged or work-product protected
6 documents, ESI or information, whether inadvertent or otherwise, is not a waiver of
7 the privilege or protection from discovery in this case or in any other federal or state
8 proceeding. This Order shall be interpreted to provide the maximum protection
9 allowed by Federal Rule of Evidence 502(d).

10 2. Nothing contained herein is intended to or shall serve to limit a
11 party's right to conduct a review of documents, ESI or information (including
12 metadata) for relevance, responsiveness and/or segregation of privileged and/or
13 protected information before production.

14
15 Dated: October 6, 2017

Dated: October 6, 2017

16 By: /s/
17 SCOTT M. MAHONEY
18 Fisher & Phillips LLP
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By: /s/ Kathleen J. England
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*Attorney for Plaintiffs,
William J. Berry, Jr., Cynthia
Falls, and Shane Kaufmann*

22 *Attorneys for Defendant,
23 Desert Palace, Inc., d/b/a
Caesars Palace*

24 **IT IS SO ORDERED:**

25 
26 United States Magistrate Judge

27 Dated: October 17, 2017